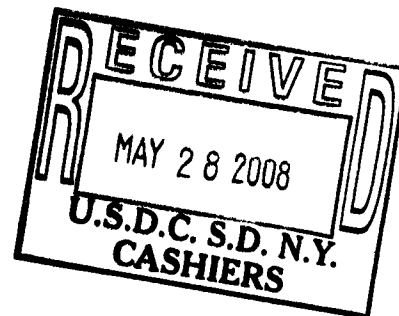


08 CV 4892

JAMES A. SAVILLE, JR.
HILL RIVKINS & HAYDEN LLP
Attorneys for Plaintiff
Rosemarie Salmassi e. Kfr.

45 Broadway – Suite 1500
New York, New York 10006
(212) 669-0600



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ROSEMARIE SALMASSI e. Kfr., :

Plaintiff, :

Index No.:

08 CV _____ ()

- Against - :

EURO-AMERICA CONTAINER LINE LTD., :

Defendant. :

VERIFIED COMPLAINT

-----X

Plaintiff, Rosemarie Salmassi e. Kfr. ("Salmassi"), by and through its attorneys, Hill Rivkins & Hayden LLP, as and for its Verified Complaint against the above-named defendant alleges upon information and belief as follows:

1. This is an admiralty or maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure and this Court has jurisdiction pursuant to 28 U.S.C. §1333 in that plaintiff's claim against defendant arises out of the breach of an ocean bill of lading.

2. At and during all material times hereinafter mentioned, plaintiff Salamassi Rosemarie Salmassi e. Kfr. ("Salamassi") was and now is a foreign individual with an address at Poppen Bütteler Bogen 15, Hamburg, Germany and was the owner of the shipment set forth herein.

3. At and during all material times hereinafter mentioned, defendant Euro-America Container Line Ltd. ("Euro-America") was and now is a foreign business entity organized and existing by virtue of foreign law with an office and place of business at Unit 4&6 BLK B 19/F Kailey IND Center, Fung Yip Street, Chailuan, Hong Kong.

4. This action is brought to obtain jurisdiction over the defendant and to obtain security for any judgment that is eventually entered against the defendant.

5. On or about January 18, 2008, Euro-America, through its agent Euro-Pac Shipping, Inc., issued a bill of lading LA1425, pursuant to which Euro-America undertook to safely transport two 2008 Mercedes Benz automobiles from New York to Korea for certain consideration.

6. On or about January 18, 2008, the foregoing automobiles were delivered to the defendant in good order and condition and suitable in every respect for the intended transit.

7. Defendant failed to redeliver the automobiles in the same good order and condition as when they were received.

8. By reason of the premises defendant has negligent and careless the handling of plaintiff's cargo, breached its duties and obligations as a common carrier and bailee of the cargo was otherwise at fault.

9. Plaintiff was the shipper, consignee or owner of said shipment and brings this action on its own behalf and, as agent and trustee, on behalf of and for the interest of all parties who may be or become interested in the said shipment, as their respective interests may ultimately appear, and plaintiff is entitled to maintain this action.

10. Plaintiff has duly performed all duties and obligations on its part to be performed.

11. By reason of the premises, Plaintiff has sustained damages as nearly as same can now be estimated, no part of which has been paid, although duly demanded, in the total amount of \$235,000.00. A true and accurate copy of the invoice setting forth the value of the automobiles is attached hereto as Exhibit 1.

12. After investigation, defendant Euro-America cannot be "found" in this District for purposes of and as delineated in Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure. Plaintiff is informed that defendant has, or will shortly have, assets within this District, including but not limited to, cash, funds, escrow funds, credits, wire transfer, electronic funds transfers, accounts, letters of credit, freights, sub-freights, charter hire and sub-charter hire, at or being transferred and/or wired to,

from or through JPMorgan Chase Bank, Citibank N.A.; American Express Bank, Ltd; Bank of America, Bank of New York, Deutsche Bank; HSB; BNP Paribas; Wachovia Bank; ABN Amro; Standard Chartered Bank; Bank of Communications; The Bank of East Asia; Bank of China; Shanghai Commercial Bank Ltd.; Bank of India and/or any other garnishee as further investigation may uncover.

WHEREFORE, plaintiff Salamassi prays:

1. That process in due form of law according to the practice of this Court may issue against defendant Euro-America citing it to appear and answer the foregoing, failing which, a default will be taken against it for the principal amount of the claim, plus interest, costs and attorneys' fees;

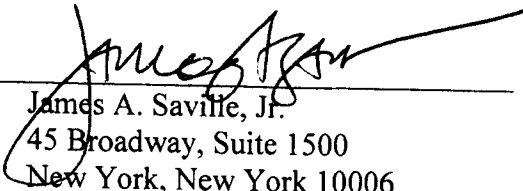
2. That if defendant Tianjin cannot be found within this District pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims, that all assets of defendant Euro-America up to and including **\$235,000.00** be restrained and attached, including but not limited to cash, funds, escrow funds, credits, wire transfer, electronic funds transfers, accounts, letters of credit, freights, sub-freights, charter hire, sub-charter hire, at or being transferred and/or wired to, from or through JPMorgan Chase Bank; Citibank N.A.; American Express Bank, Ltd; Bank of America; Bank of New York; Deutsche Bank; HSBC; BNP Paribas; Wachovia Bank; ABN Amro; Standard Chartered Bank; Bank of Communications; The Bank of East Asia; Bank of China; Shanghai Commercial Bank Ltd., Bank of India and/or other garnishees upon who a Writ of Maritime Attachment and Garnishment may be served; and

3. And for such other and further relief as this Court may deem just and proper.

Dated: New York, New York
May 27, 2008

HILL RIVKINS & HAYDEN LLP
Attorneys for Plaintiff
SALAMASSI ROSEMARIE SALMASSI e. Kfr.

By: _____


James A. Saville, Jr.
45 Broadway, Suite 1500
New York, New York 10006
(212) 669-0600

29856/VERIFIED COMPLAINT

VERIFICATION

I, James A. Saville, Jr., hereby affirm as follows:

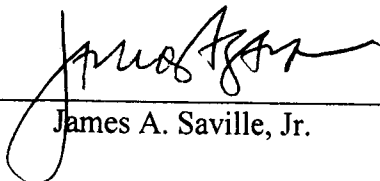
1. I am a member of the firm Hill Rivkins & Hayden LLP, attorneys for plaintiff Salamassi Rosemarie Salmassi e. Kfr. I have prepared and read the foregoing Verified Complaint and know the contents thereof and, the same is true to the best of my knowledge, information and belief.

2. The sources of my knowledge, information and belief are documents provided by our clients and our discussions with them.

3. As plaintiff is a foreign citizen residing outside the Southern District of New York, this verification is made by me as counsel of record.

I hereby affirm that the foregoing statements are true and correct.

Dated: New York, New York
May 27, 2008



James A. Saville, Jr.

Exhibit 1



CAREX · Poppenbütteler Bogen 15 · D-22399 Hamburg

MESSRS

SB MOTORS

#525 HO EUNKWAN SEOUL AUTO GALLERY

217 YANGJAE-DONG SEOCHO-GU

TEL:+82.2.2059.5570

Rosemarie Salmassi e. Kfr.

Poppenbütteler Bogen 15

D-22399 Hamburg

Telefon: +49 - (0)700 SALMASSI

Telefon: +49 - (0)40 / 606 60 60

Telefax: +49 - (0)40 / 602 30 73

USt-ID-Nr.: DE 1184 35 939

Steuer-Nr.: 09 220 51496

E-mail: info@Carex-Hamburg.com

www.Carex-Hamburg.com

COMMERCIAL INVOICE

C-8000-019

25. Feb. 08

1 unit Mercedes Benz S550L(W221) Brand New Cars Model 2008

No. 51

040 black / 201 Black leather

Ch-No.: WDDNG71X58A184157

Options: 218-220-223-231-275-289-297-301-310-386-401-413-432-443-

475-551-573-581-595-610-615-690-731-770-772-810-814-875-876-881

883-889-U12-057-390

TOTAL PRICE FOB EAST COAST PORT 112.000,00 USD

Bankverbindungen:

Vereins- und Westbank
Berenberg Bank

Konto-Nr. 6105175, (BLZ 200 300 00), **SWIFT:** VUWBDEHH, **IBAN:** DE34 2003 0000 0006 1051 75
Konto-Nr. 16036006, (BLZ 201 200 00), **SWIFT:** BEGODEHH, **IBAN:** DE63 2012 0000 0016 0360 06

Handelsregister:
Hamburg
HRA 80 364



CAREX · Poppenbütteler Bogen 15 · D-22399 Hamburg

MESSRS

SB MOTORS

#525 HO EUNKWAN SEOUL AUTO GALLERY

217 YANGJAE-DONG SEOCHO-GU

TEL:+82.2.2059.5570

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Telefon: +49 - (0)700 SALMASSI

Telefon: +49 - (0)40 / 606 60 60

Telefax: +49 - (0)40 / 602 30 73

USt-ID-Nr.: DE 1184 35 939

Steuer-Nr.: 09 220 51496

E-mail: info@Carex-Hamburg.com

www.Carex-Hamburg.com

COMMERCIAL INVOICE

25. Feb. 08

C-8000-020

1 unit Mercedes Benz S550L 4-Matic (W221) Brand New Cars Model 2008

No. 54

775 silver / 201 Black leather

Ch-No.: WDDNG86X48A196847

Options: 218-220-223-231-275-289-297-301-310-386-401-402-413-

432-443-475-530-551-573-581-582-595-610-615-690-731-772-780-

810-814-875-876-881-883-889-U12-390

TOTAL PRICE FOB EAST COAST PORT 123.000,00 USD

Bankverbindungen:

Vereins- und Westbank
Berenberg Bank

Konto-Nr. 6105175, (BLZ 200 300 00), **SWIFT:** VUWBDEHH, **IBAN:** DE34 2003 0000 0006 1051 75
Konto-Nr. 16036006, (BLZ 201 200 00), **SWIFT:** BEGODEHH, **IBAN:** DE63 2012 0000 0016 0360 06

Handelsregister:
Hamburg
HRA 80 364